
From: Kenneth Roller (Services - 6) [/O=DOMINION/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=KENNE64]
Sent: 10/21/2015 5:04:57 PM
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Subject: FW: Coal Ash VPDES Provisions

FYI.

From: Kenneth Roller (Services - 6)
Sent: Wednesday, October 21, 2015 5:04 PM
To: 'Brockenbrough, Allan (DEQ)'
Subject: RE: Coal Ash VPDES Provisions

Allan,

We evaluated the proposed *Ash Pond Decanting/Dewatering Special Condition* relative to site-specific conditions at each of the four power stations with pond closure activities. Based on that evaluation we are proposing a modified condition that could be included in the permits for Bremono, Chesterfield, and Possum Point, and a second modified condition that is specific to the Chesapeake Energy Center. These conditions are presented below.

Decanting at two of the facilities will involve pumping of the pond surface water. Therefore, we are proposing to remove the requirement that the pond be decanted by gravity and removal of the threshold condition (b) for triggering the Part I.B. limits.

In addition, we recognize the need to include a threshold TSS concentration; however, 30 mg/L is the current monthly average limit for discharges from our ash ponds and single measurements above 30 mg/L do not necessarily indicate that the pond discharge is out of compliance. Consequently, we are proposing to use 30 mg/L bi-weekly average and 90 mg/L maximum daily as the threshold concentrations. These thresholds, while still in compliance with permit limits, would provide an indication of the need for additional effluent treatment.

We are also proposing changes to threshold condition (c), previously (d), to clarify the type of treatment that would trigger limits associated with dewatering. We believe that these changes more clearly link threshold conditions (a) and (c).

We are proposing the remainder of the changes in order to more clearly delineate the point at which decanting begins or the line between decanting and dewatering.

With respect to the Chesapeake Energy Center, there is very little if any surface water remaining in the bottom ash pond at this time so there is not the need to differentiate between decanting and dewatering and the trigger for Part I.B limits could simply be the disturbance of the ash for the purpose of dewatering.

I'd be happy to discuss these proposed changes with you.

Ken

Bremo, Chesterfield, Possum Point

*The permittee shall notify the DEQ Regional Office upon commencing operations to draw down the water elevation in the ash pond in preparation of ~~to permanently remove all surface water for final pond closure.~~ **Once the draw down process for final pond closure commences,** water decanted ~~by gravity~~ from the pond surface shall be released at a controlled rate not to exceed one foot of pond surface elevation per day to minimize the discharge of any solids. **In addition, once this process commences,** an effluent grab sample for Total Suspended Solids (TSS) shall be taken and analyzed daily ~~once the draw down process commences and shall continue until the limits in Part I.B become effective.~~ **During this draw down process for final pond closure, upon the first to occur of: either** (a) obtaining a TSS sample greater than or equal to 90 mg/L or a bi-weekly average TSS concentration greater than or equal to 30 mg/l, ~~(b) use of non-gravity methods or hydraulic pumping of the pond water,~~ (b) altering the surface of the settled ash through trenching, boring, or other*

mechanical means to facilitate dewatering, or (c) ~~the using of an on-site treatment unit~~ to ensure compliance with TSS effluent limits, the monitoring requirements and effluent limits in Part I.B. of this permit shall become effective and remain effective until the dewatering process ~~the closure process~~ is complete. The permittee shall provide written notification to the DEQ Regional Office no later than 24 hours following meeting the first occurrence of any of provisions (a) through (c) of this special condition.

Chesapeake

The permittee shall provide written notification to the DEQ Regional Office no later than 24-hours following the altering of the surface of the settled ash through trenching, boring, or other mechanical means to facilitate ash dewatering in order to close the station's bottom ash pond and/or for installation of the leachate collection pipe around the perimeter of the ash landfill. At that time the monitoring requirements and effluent limits in Part I.B. of this permit shall become effective and remain effective until the dewatering process is complete.

From: Brockenbrough, Allan (DEQ) [<mailto:Allan.Brockenbrough@deq.virginia.gov>]
Sent: Friday, October 16, 2015 1:05 PM
To: Kenneth Roller (Services - 6)
Subject: Coal Ash VPDES Provisions

Ken-

In our meeting last Friday we agreed to provide Dominion with updates for two provisions in the proposed VPDES permits.

1. Distinguishing between decanting and dewatering and identifying when the additional limitations apply
2. Language to address concerns with stormwater runoff from haul routes, loading areas, etc.

The following language is not final but should be close to what we include in the draft permits.....

Ash Pond Decanting/Dewatering Special Condition

The permittee shall notify the DEQ Regional Office upon commencing operations to draw down the water elevation in the ash pond in preparation of pond closure. Water decanted by gravity from the pond surface shall be released at a controlled rate not to exceed one foot of pond surface elevation per day to minimize the discharge of any solids. An effluent grab sample for Total Suspended Solids (TSS) shall be taken and analyzed daily once the draw down process commences and shall continue until the limits in Part I. B become effective.. Upon either (a) obtaining a TSS sample greater than or equal to 30 mg/l, (b) use of non-gravity methods or hydraulic pumping of the pond water, (c) altering the surface of the settled ash through trenching, boring, or other mechanical means to facilitate dewatering, or (d) the use of an on-site treatment unit, the monitoring requirements and effluent limits in Part I.B. of this permit shall become effective and remain effective until the closure process is complete. The permittee shall provide written notification to the DEQ Regional Office no later than 24 hours following meeting the first occurrence of any of provisions (a) through (d) of this special condition.

Ash Pond Closure Stormwater Management Special Condition

Best management practices (BMPs), structural and/or non-structural, shall be utilized by the permittee to minimize the impact of ash pond closure activities on stormwater quality. Ash pond closure activities may include, but are not limited to, the process of ash movement for off-site disposal, ash loading and unloading areas, any area(s) associated with the storage of ash prior to transport off-site, and vehicle tracking associated with the movement of ash.

The facility's Stormwater Pollution Prevention Plan (SWPPP)/O&M Manual (if the IP has stormwater language in it already we could just update the SWPPPP / if no stormwater language, add it to the O&M?) shall include a description of the BMPs being implemented and a regular schedule for preventive maintenance of all BMPs where appropriate. All structural BMPs identified in the SWPPP/O&M shall be maintained in effective operating condition and shall be inspected for structural integrity and operational efficiency once per week during ash pond closure activities. Results of the weekly inspections and actions needed and performed in response to the weekly inspections shall be documented per the SWPPP/O&M Manual.

Please feel free to give me a call with any comments

Allan

Allan Brockenbrough, II, P.E.

DEQ - Office of VPDES Permits

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